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October 28, 2024

BY E.C.F.

Hon. Vernon S. Broderick
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

APPLICATION GRANTED

SO ORDERED

VERNON S. BRODERICK

U.S.D.J. 10/29/2024

The court extends their condolences to
Mr. Darden, Jr.

**Re: *United States v. Calvin Darden, Jr.,*
23 Cr. 134 (VSB)**

Dear Judge Broderick:

This letter motion is submitted to request a temporary modification of conditions of bail in the above-referenced matter to permit the defendant, Calvin Darden, Jr., to travel to New York City for two memorial services being held in honor of his first cousin, Kaseem Ryan, who died unexpectedly, on October 12, 2024, at the age of 52.

There are two memorial services scheduled on two consecutive days. The first memorial service will be held on Friday, November 1, 2024, at 7:00 p.m., at an event space named "501 Union" located at 499 Union St., Brooklyn, New York. The second memorial service will be conducted by the New York City Fire Department, in honor of Kaseem Ryan, who was a retired FDNY Captain and 9/11 first responder. On Saturday, November 2, 2024, at 9:00 a.m., there will be a procession from Kaseem Ryan's Brooklyn firehouse to the World Trade Center Memorial, where an FDNY memorial service will follow at 11:00 a.m.

If permitted by the court to travel, Calvin Darden, Jr., would make arrangements (1) to fly from Atlanta to New York on Thursday, October 31, 2024, (2) to stay at a hotel located in Manhattan, and (3) to fly home to Atlanta on Sunday, November 3, 2024. He would also provide his travel itinerary, once made, to Senior U.S. Probation Officer Krystal J. Batchelor, who is responsible for monitoring Calvin Darden, Jr. in the Northern District of Georgia. Additionally, if permitted to travel, Calvin Darden, Jr., relates that he would be traveling with and accompanying his elderly parents to and from the memorial services.

This application has been discussed with SDNY Pretrial Services Officer John Moscato, as well as Senior U.S. Probation Officer Krystal J. Batchelor, of the Northern District of Georgia, who each have no objection. Additionally, the government has been informed of this application and has indicated that it takes no position.

Lastly, should the court grant this application, all other conditions of bail are to remain the same.

Respectfully submitted,

Steven Z. Legon

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Erica Ashley Reed, Esq.

Attorneys for Calvin Darden, Jr.

cc: All Counsel of Record (By E.C.F.)

cc: U.S. Pretrial Services Officer John Moscato (By Email)

cc: Senior U.S. Probation Officer Krystal J. Batchelor (By Email)